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April 21, 2021

Via ECF

Hon. Cheryl L. Pollak
United States District Court Judge
Eastern District of New York
United States Courthouse
225 Cadman Plaza E.
Brooklyn, NY 11201

Re: Status Report

Case Name: SHEEHAN V. CONSENSYS, INC.

Case No. 19-cv-04154 (DLI)(CLP)

Dear Judge Pollak,

I represent the Plaintiff in the above referenced matter. In accordance with the Court's last Order, I am updating the Court concerning the status of my client.

By way of background, in late July, I was notified by Plaintiff Sheehan's girlfriend that he went into cardiac arrest at his home. She managed to keep him alive by administering CPR, until paramedics arrived. The paramedics were able to sustain Mr. Sheehan until he was placed on life support when he arrived at the hospital. Mr. Sheehan was in a coma for some time, but he has been slowly improving.

I spoke with Mr. Sheehan's mother on Monday April 19, 2021. Currently, Mr. Sheehan is in much the same condition he was in as of the last conference. He has a long road to recovery ahead of him, but he is improving- slowly. He can speak, but it depends on his energy levels. Speaking takes a lot of energy from him. His vision has improved but he is essentially blind at this time. And his body is very weak; he must learn to walk again. On top of all the physical rehabilitation, he is in a tremendous amount of pain. Accordingly, Mr. Sheehan cannot sit for a deposition or prosecute his claim at this time.

Mr. Sheehan's mother has power of attorney over Mr. Sheehan. She asked me if it was possible for her to try to settle the lawsuit on Ryan's behalf. I told her that I would raise the issue with the Court, although I have not yet spoken with opposing counsel to determine if the Defendants have any appetite for settlement.

Thank you for your time and consideration of this request.

Respectfully Submitted,

By: Jordan El-Hag
Jordan El-Hag, Esq.